NEW CONSTRUCTION
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Nishikawa Standard, Inc.
2808 Adams Center Road
Ft. Wayne, Indiana 46803

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 003-11924-00229	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary automotive weather stripping manufacturing process.

Authorized Individual:	CoLette Schlegel
Source Address:	2808 Adams Center Road, Ft. Wayne, Indiana 46803
Mailing Address:	2808 Adams Center Road, Ft. Wayne, Indiana 46803
Phone Number:	219-493-7938
SIC Code:	3069
County Location:	Allen
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) an automated appearance coating high volume low pressure (HVLP) spray booth (Civic Mainseal) and brush application area (Civic Subseal) for producing a maximum of 511 pounds of coated rubber window sealing systems per hour.

This stationary source is approved to operate the following emissions units and pollution control devices:

(b) extrusion line No. 1 consisting of:

(1) two (2) rubber extruders with a production capacity of 334 pounds per hour, each;

(2) two (2) plastic extruders with a production capacity of 9.5 pounds per hour, each;

(3) three (3) natural gas combustion units, identified as O-1, O-2, and O-3, with a total capacity of 0.782 million Btu per hour (MM Btu/hr);

(4) one (1) pneumatic abrasive blast machine with a cyclone and cartridge collector;

(c) one (1) Civic Coating Line, consisting of six (6) rubber coating areas identified as Brush Application Areas 1 through 6, each rated at 97.5 rubber parts per hour, each utilizing a brush application method, with Brush Application Areas 1 and 4 exhausting through one (1) stack identified as stack 1, Brush Application Areas 2 and 5 exhausting through one (1) stack identified as stack 2, and Brush Application Areas 3 and 6 exhausting through one (1) stack identified as stack 3;

(d) fifteen (15) natural gas fired space heating units with a combined capacity of 18.85 million Btu per hour (MMBtu/hr);

(e) one (1) spray booth, with a capacity of 78.5 pounds of EPDM rubber weather stripping per hour, utilizing high volume low pressure (HVLP) spraying and dry filter controls;

(f) three (3) high volume low pressure (HVLP) spray booths with dry filters to control overspray:

(1) Booth B-1A coating a maximum of 117 car weather stripping units per hour, and

(2) Booths C-1A and C-2B coating a maximum of 234 car weather stripping units per hour, each, sharing a common exhaust.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled “Minor Source Operating Permit”, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

(e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.2 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.3 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.4 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.5 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.6 Visible Emissions Limitations [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings.

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

Testing Requirements

C.7 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.10 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

C.11 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.12 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.13 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.14 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a

period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) A malfunction as described in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.16 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Management stating whether or

not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

(a)	an automated appearance coating high volume low pressure (HVLP) spray booth (Civic Mainseal) and brush application area (Civic Subseal) for producing a maximum of 511 pounds of coated rubber window sealing systems per hour.
(e)	one (1) spray booth, with a capacity of 78.5 pounds of EPDM rubber weather stripping per hour, utilizing high volume low pressure (HVLP) spraying and dry filter controls;
(f)	three (3) high volume low pressure (HVLP) spray booths with dry filters to control overspray:
	(1) Booth B-1A coating a maximum of 117 car weather stripping units per hour, and (2) Booths C-1A and C-2B coating a maximum of 234 car weather stripping units per hour, each, sharing a common exhaust.

Emission Limitations and Standards

D.1.1 BACT Condition [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and CP-003-4469-00229, issued February 12, 1996, spray booths A-1A, B-1A, C-1A, C-2B, D-1A and D-2B shall use High Volume Low Pressure (HVLP) spray application systems at all time during which the spray booth application systems are operated. HVLP spray application is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the spray coating booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for spray booths A-1A, B-1A, C-1A, C-2B, D-1A and D-2B and the associated control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test these emissions units by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions units are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the spray booths are in operation.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

(b)(4) one (1) pneumatic abrasive blast machine with a cyclone and cartridge collector;

Emission Limitations and Standards

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the pneumatic abrasive blast machine shall not exceed 0.551 pounds per hour when operating at a process weight rate of 10 pounds of abrasive per 24 hours.

The pounds per hour limitation is based on a process weight rate less than 100 pounds per hour.

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Nishikawa Standard, Inc.**
Address:	**2808 Adams Center Road**
City:	**Ft. Wayne, Indiana 46803**
Phone #:	**219-493-7938**
MSOP #:	**003-11924-00229**

I hereby certify that Nishikawa Standard, Inc. is **9** still in operation.
9 no longer in operation.

I hereby certify that Nishikawa Standard, Inc. is
9 in compliance with the requirements of MSOP 003-11924-00229.
9 not in compliance with the requirements of MSOP 003-11924-00229.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____
INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND
REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:
_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

PAGE 1 OF 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

PAGE 2 OF 2

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for New Construction
and Minor Source Operating Permit

Source Name:	Nishikawa Standard, Inc.
Source Location:	2808 Adams Center Road, Ft. Wayne, Indiana 46803
County:	Allen
SIC Code:	3069
Operation Permit No.:	003-11924-00229
Permit Reviewer:	Janusz Johnson

On April 14, 2000, the Office of Air Management (OAM) had a notice published in the *??*, ??, Indiana, stating that Nishikawa Standard, Inc., had applied for approval to construct new emission units at a stationary automotive weather stripping manufacturing plant. The notice also stated that OAM proposed to issue a Minor Source Operating Permit (MSOP) for this source and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 12, 2000, Nishikawa Standard, Inc., submitted comments on the proposed permit. The summary of the comments and corresponding responses is as follows (new language is bolded for emphasis):

Comment 1: Under Section A.2 (a) the description of the equipment is correct as stated, in the spray booth we are using a HVLP spray gun.

Response 1: The facility description in Section A.2, Item (a), and Item (a) at the beginning of Section D on Pages 4 and 17, respectively, has been revised as follows to account for the high volume low pressure (HVLP) spray technology:

> (a) an automated appearance coating **high volume low pressure (HVLP)** spray booth (Civic Mainseal) and brush application area (Civic Subseal) for producing a maximum of 511 pounds of coated rubber window sealing systems per hour.

Comment 2: In Section A.2 (c) and (d) the descriptions of the equipment are correct as stated, however these are part of extrusion line No.1.

Comment 3: Section A.2 (h) lists emission units permitted under approval No. 003-4982 which were later modified and registered under a subsequent permit approval (No. 003-8660) and are actually part of the equipment listed in Item (e).

Comment 4: The emission units in Item (i) of Section A.2 should be revised to delete nos. 1 (Booth A-1A) and 4 (Booths D-1A and D-2B) and revise no. 3 to account for the fact that Booths C-1A and C-2B now paint all the units previously painted in Booths A-1A, D-1A and D-2B), a total of 234 units.

Responses 2, 3 and 4:

The facility descriptions (other than Item (a), above) in Section A.2 on Page 4 have been revised as follows to account for these changes:

(b) extrusion line No. 1 consisting of:

(1) two (2) rubber extruders with a production capacity of 334 pounds per hour, each;

(2) two (2) plastic extruders with a production capacity of 9.5 pounds per hour, each;

~~(c)~~ **(3)** three (3) natural gas combustion units, identified as O-1, O-2, and O-3, with a total capacity of 0.782 million Btu per hour (MM Btu/hr);

~~(d)~~ **(4)** one (1) pneumatic abrasive blast machine with a cyclone and cartridge collector;

~~(e)~~**(c)** one (1) Civic Coating Line, consisting of six (6) rubber coating areas identified as Brush Application Areas 1 through 6, each rated at 97.5 rubber parts per hour, each utilizing a brush application method, with Brush Application Areas 1 and 4 exhausting through one (1) stack identified as stack 1, Brush Application Areas 2 and 5 exhausting through one (1) stack identified as stack 2, and Brush Application Areas 3 and 6 exhausting through one (1) stack identified as stack 3;

~~(f)~~**(d)** fifteen (15) natural gas fired space heating units with a combined capacity of 18.85 million Btu per hour (MMBtu/hr);

~~(g)~~**(e)** one (1) spray booth, with a capacity of 78.5 pounds of EPDM rubber weather stripping per hour, utilizing high volume low pressure (HVLP) spraying and dry filter controls;

~~(h) six (6) brush application paint booths with maximum capacities of 39.3 pounds of car weather stripping per hour, each; and~~

~~(i)~~**(f)** ~~six (6)~~ **three (3)** high volume low pressure (HVLP) spray booths with dry filters to control overspray:

(1) ~~Booth A-1A coating a maximum of 52 car weather stripping units per hour,~~

~~(2)~~ Booth B-1A coating a maximum of 117 car weather stripping units per hour, **and**

~~(3)~~**(2)** Booths C-1A and C-2B coating a maximum of ~~65~~ **234** car weather stripping units per hour, each, sharing a common exhaust~~, and~~**.**

~~(4) Booths D-1A and D-2B coating a maximum of 117 car weather stripping units per hour, each, sharing a common exhaust.~~

Note: Items (g) and (i) in the facility description at the beginning of Section D.1 on Page 17 of the

permit and Item (d) at the beginning of Section D.2 on Page 19 of the permit have been renumbered and revised consistent with the changes outlined above.

As a result of the information provided by Nishikawa Standard, Inc., during the public notice period, the number of emission units changed from the originally proposed facilities in the draft permit. Page 2 of Appendix A of the TSD was revised to account for this change, and the following are updated "Potential To Emit of Modification" and "Potential to Emit of Modification After Issuance" analyses which include the changes (revised from Pages 4 and 5 of the TSD); there are no significant changes which result from the revised information:

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

The potential to emit for the entire source based on the previously issued approvals added to the new automated appearance coating spray line and manual application area is:

Pollutant	Potential To Emit (tons/year)
PM	9.82
PM-10	9.82
SO_2	0.05
VOC	**47.53**
CO	1.8
NO_x	8.6

HAP's	Potential To Emit (tons/year)
TOTAL	**3.84**

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of volatile organic compounds (VOC) from the source is equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1 (Minor Source Operating Permit Program).

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of volatile organic compounds (VOC) from the new emission units is less than 10 tons per year. Therefore, the modification is exempt under 326 IAC 2-1.1-3 (Exemptions).

Potential to Emit

The table below summarizes the total potential to emit of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Civic Mainseal spray booth and Subseal Brush Application Area	3.15	3.15	0.00	6.42	0.00	0.00	0.67
Extrusion Line No.1 (two (2) rubber extruders and two (2) plastic extruders); combustion units O-1,2 and 3; and a pneumatic blast machine	0.02	0.02	0.00	2.48	0.07	0.35	1.62
Civic coating line (six (6) brush application areas)	0.00	0.00	0.00	0.48	0.00	0.00	0.02
Fifteen (15) space heaters	0.98	0.98	0.05	0.44	1.73	8.25	0.00
Rubber weather stripping spray booth (HVLP)	0.05	0.05	0.00	0.26	0.00	0.00	0.21
~~Six (6) brush application booths for weather stripping~~	~~0.00~~	~~0.00~~	~~0.00~~	~~1.43~~	~~0.00~~	~~0.00~~	~~0.95~~
Three (3) HVLP weather stripping spray booths	5.62	5.62	0.00	37.45	0.00	0.00	1.32
Total Emissions	9.82	9.82	0.05	**47.53**	1.80	8.60	**3.84**

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for New Construction and Minor Source Operating Permit

Source Background and Description

Source Name:	**Nishikawa Standard, Inc.**
Source Location:	**2808 Adams Center Road, Ft. Wayne, Indiana 46803**
County:	**Allen**
SIC Code:	**3069**
Operation Permit No.:	**003-11924-00229**
Permit Reviewer:	**Janusz Johnson**

The Office of Air Management (OAM) has reviewed an application from Nishikawa Standard, Inc., relating to the construction and operation of the following new emission units:

(a) an automated appearance coating spray booth (Civic Mainseal) and brush application area (Civic Subseal) for producing a maximum of 511 pounds of coated rubber window sealing systems per hour.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices (listed under previous approval numbers):

Nos. 003-7360 and 003-9770

(b) extrusion line No. 1 consisting of:

(1) two (2) rubber extruders with a production capacity of 334 pounds per hour, each;
(2) two (2) plastic extruders with a production capacity of 9.5 pounds per hour, each;

(c) three (3) natural gas combustion units, identified as O-1, O-2, and O-3, with a total capacity of 0.782 million Btu per hour (MM Btu/hr);

(d) one (1) pneumatic abrasive blast machine with a cyclone and cartridge collector;

No. 003-8660

(e) one (1) Civic Coating Line, consisting of six (6) rubber coating areas identified as Brush Application Areas 1 through 6, each rated at 97.5 rubber parts per hour, each utilizing a brush application method, with Brush Application Areas 1 and 4 exhausting through one (1) stack identified as stack 1, Brush Application Areas 2 and 5 exhausting through one (1) stack identified as stack 2, and Brush Application Areas 3 and 6 exhausting through one (1) stack identified as stack 3;

No. 003-7049

(f) fifteen (15) natural gas fired space heating units with a combined capacity of 18.85 million Btu per hour (MMBtu/hr);

No. 003-5159

(g) one (1) spray booth, with a capacity of 78.5 pounds of EPDM rubber weather stripping per hour, utilizing high volume low pressure (HVLP) spraying and dry filter controls;

No. 003-4892

(h) six (6) brush application paint booths with maximum capacities of 39.3 pounds of car weather stripping per hour, each; and

No. 003-4469

(i) six (6) high volume low pressure (HVLP) spray booths with dry filters to control overspray:

(1) Booth A-1A coating a maximum of 52 car weather stripping units per hour,
(2) Booth B-1A coating a maximum of 117 car weather stripping units per hour,
(3) Booths C-1A and C-2B coating a maximum of 65 car weather stripping units per hour, each, sharing a common exhaust, and
(4) Booths D-1A and D-2B coating a maximum of 117 car weather stripping units per hour, each, sharing a common exhaust.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Exemption No. 003-9770-00229, issued on July 10, 1998;
(b) Exemption No. 003-8660-00229, issued on January 9, 1998;
(c) Exemption No. 003-7360-00229, issued on January 13, 1997;
(d) Registration No. 003-7049-00229, issued on December 30, 1996;
(e) Exemption No. 003-5159-00229, issued on August 29, 1996;
(f) Exemption No. 003-4982-00229, issued on November 8, 1995; and
(g) Permit No. 003-4469-00229, issued on February 12, 1996;

All conditions from previous approvals were incorporated into this permit except the following:

(a) Exemption No. 003-7360-00229

Condition 1: Pursuant to 326 IAC 6-3-2 (Particulate Matter Limitations for Process Operation), the PM emissions from abrasive blasting shall not exceed 0.014 pounds per hour. The cyclone and collector shall be operated at all times when the abrasive blast machine is in operation.

The limit in this condition has been replaced. The revised limit has been determined more appropriate because the language of 326 IAC 6-3-2 does not provide for extrapolation of the data below the 100 pound per hour process weight rate, as was previously done to calculated the limit of 0.014 pounds per hour. The correct limit on the PM emissions from the process should be 0.551 pounds per hour based on the process weight rate being less than 100 pounds per hour. Additionally, the requirement to operate the controls at all times that the abrasive blast machine is in operation has been removed because the controls are not required to demonstrate compliance with 326 IAC 6-3-2.

Condition 3: Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

This condition has been removed because the applicability language in 326 IAC 1-6-1 (Malfunctions: applicability) that "the requirements of the rule shall apply to the owner or operator of any facility required to obtain a permit." The facilities to which this condition was applied were part of an exemption and did not require a permit; therefore, the rule is not applicable.

(b) Registration No. 003-7049-00229

Condition 1: Pursuant to 326 IAC 6-2-3 (Particulate Matter Limitations for Indirect Heating Sources), the PM emissions from 13 natural gas fired heaters that were installed before September 21, 1983, (all units except UNK-4 and UNK-5), with a combined capacity of 13.85 MMBtu/hr, shall not exceed 0.8 pounds per million Btu heat input.

Condition 2: Pursuant to 326 IAC 6-2-4 (Particulate Matter Limitations for Indirect Heating Sources), the PM emissions from 2 natural gas fired heaters that were installed after September 21, 1983, (the two (2) units UNK-4 and UNK-5), with a combined capacity of 5 MMBtu/hr, shall not exceed 0.5 pounds per million Btu heat input.

These conditions have been removed because the natural gas fired heaters specified in the conditions are forced air heaters and are not considered "indirect" heating sources; therefore, the rule does not apply.

Stack Summary

Stack ID *	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
07	Civic Mainseal spray booth	29	12	2800	ambient
08	Civic Subseal area heater (electric)	29	12	2800	ambient

** Only new stacks listed*

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction of the new emission units and operation of the source be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on February 23, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations which determine the PTE of the new emission units and a summary of the entire source emissions (2 pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

The potential to emit for the entire source based on the previously issued approvals added to the new automated appearance coating spray line and manual application area is:

Pollutant	Potential To Emit (tons/year)
PM	9.82
PM-10	9.82
SO_2	0.05
VOC	48.96
CO	1.8
NO_x	8.6

HAP's	Potential To Emit (tons/year)
TOTAL	4.79

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of volatile organic compounds (VOC) from the source is equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1 (Minor Source Operating Permit Program).

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of volatile organic compounds (VOC) from the new emission units is less than 10 tons per year. Therefore, the modification is exempt under 326 IAC 2-1.1-3 (Exemptions).

Potential to Emit

The table below summarizes the total potential to emit of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Civic Mainseal spray booth and Subseal Brush Application Area	3.15	3.15	0.00	6.42	0.00	0.00	0.67
Extrusion Line No.1 (two (2) rubber extruders and two (2) plastic extruders); combustion units O-1,2 and 3; and a pneumatic blast machine	0.02	0.02	0.00	2.48	0.07	0.35	1.62
Civic coating line (six (6) brush application areas)	0.00	0.00	0.00	0.48	0.00	0.00	0.02
Fifteen (15) space heaters	0.98	0.98	0.05	0.44	1.73	8.25	0.00
Rubber weather stripping spray booth (HVLP)	0.05	0.05	0.00	0.26	0.00	0.00	0.21
Six (6) brush application booths for weather stripping	0.00	0.00	0.00	1.43	0.00	0.00	0.95
Six (6) HVLP weather stripping spray booths	5.62	5.62	0.00	37.45	0.00	0.00	1.32
Total Emissions	9.82	9.82	0.05	48.96	1.80	8.60	4.79

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Allen County has been classified as attainment or unclassifiable for all other regulated air pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	6.67
PM10	6.67
SO_2	0.05
VOC	42.54
CO	1.80
NO_x	8.60

(a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) These emissions were based on all prior approvals issued to the source.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO_x (ton/yr)
Proposed Modification	3.15	3.15	0.00	6.42	0.00	0.00
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from the modification, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAM inspector assigned to the source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability

326 IAC 2-6 (Emission Reporting)

This source is located in Allen County and the potential to emit VOC is less than 100 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings.

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-3-2, (Particulate Matter Limitations for Process Operations)

The particulate matter (PM) from the spray coating booths shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

To comply with this limit, the dry filters shall be in place and operable at all times the spray coating booths are in operation.

The PM emissions from abrasive blasting shall be limited to 0.551 pounds per hour based on a process weight rate of less than 100 pounds per hour. The abrasive blast machine has uncontrolled PTE PM less than the limited level of emissions required by this rule; therefore, it

can comply with this rule.

326 IAC 8-1-6 (General reduction requirements for new facilities)

Pursuant to 326 IAC 8-1-6, the six (6) spray booths permitted in CP 003-4469-00229 (I.D.#'s A-1A, B-1A, C-1A, C-2B, D-1A and D-2B) shall use High Volume Low Pressure (HVLP) application systems at all time during which the spray booth application systems are operated.

Conclusion

The construction of the new emission units and operation of this source shall be subject to the conditions of the attached proposed **Minor Source Operating Permit 003-11924-00229.**

Appendix A: Emission Calculations
Source Potential to Emit (PTE) Summary

Company Name: Nishikawa Standard Company
Address City IN Zip: 2808 Adams Center Road, Fort Wayne, IN 46803
Permit No.: 003-11924-00229
Reviewer: Janusz Johnson
Date: March 22, 2000 (Revised May 12, 2000)

Approval No.	Emission units	potential to emit (Tons/yr)						
		PM	PM10	SO2	VOC	CO	NOx	HAPs
003-11924	automated appearance coating spray line and manual application area for Civic rubber window sealing systems	3.15	3.15	0.00	6.42	0.00	0.00	0.67
003-9770	one (1) rubber extruder and one (1) plastic extruder	0.00	0.00	0.00	2.48	0.00	0.00	1.62
003-8660	Civic coating line consisting of six (6) brush coating areas	0.00	0.00	0.00	0.48	0.00	0.00	0.02
003-7360	one (1) rubber extruder and one (1) plastic extruder; combustion units O-1, O-2 and O-3; pneumatic abrasive blast machine	0.02	0.02	0.00	0.00	0.07	0.35	0.00
003-7049	fifteen (15) space heating units	0.98	0.98	0.05	0.44	1.73	8.25	0.00
003-5159	one (1) HVLP spray booth for rubber weather stripping	0.05	0.05	0.00	0.26	0.00	0.00	0.21
003-4982	six (6) brush application paint booths for weather stripping *(no emissions because units were MODIFIED AND INCLUDED UNDER 003-8660)*							
003-4469	Three (3) HVLP spray booths for weather stripping	5.62	5.62	0.00	37.45	0.00	0.00	1.32
	Total Source PTE	**9.82**	**9.82**	**0.05**	**47.53**	**1.80**	**8.60**	**3.84**

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Nishikawa Standard Company
Address City IN Zip: 2808 Adams Center Road, Fort Wayne, IN 46803
Permit No.: 003-11924-00229
Reviewer: Janusz Johnson
Date: March 22, 2000

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Mainseal Automated Booth																
SP 217	8.73	60.20%	49.8%	10.4%	52.2%	34.70%	0.00230	360.0	1.90	0.91	0.75	18.04	3.29	3.15	2.62	75%
Subseal Brush Application																
FKA	6.67	90.00%	0.0%	90.0%	0.0%	4.50%	0.00033	360.0	6.00	6.00	0.71	17.12	3.12	0.00	133.42	100%
State Potential Emissions			**Add worst case coating to all solvents**								**1.47**	**35.16**	**6.42**	**3.15**		

HAPs as applied

Coating	Usage	HAP content (lb/gal applied)		PTE HAPs (lb/hr)		PTE HAPs (ton/hr)	
	(Gal/hr)	toluene	xylene	toluene	xylene	toluene	xylene
SP 217	0.83	0.000	0.023	0.00	0.02	0.00	0.08
FKA	0.12	0.744	0.382	0.09	0.05	0.39	0.20

PTE Total HAPs
0.67 ton/yr

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used